

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

v.

SOUTHWEST AIRLINES CO.,

Defendant.

Civil Action No. 7:24-cv-00277-ADA

JURY TRIAL DEMANDED

**DECLARATION OF JONATHAN K. WALDROP IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION TO
SEVER AND STAY CLAIMS AGAINST IN-FLIGHT CONNECTIVITY
SYSTEMS BASED ON THE CUSTOMER-SUIT EXCEPTION**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz Benson Torres LLP. I am one of the attorneys responsible for the representation of Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (collectively, "Plaintiffs") in this matter and make this declaration in support of Plaintiffs' Opposition to Defendant's Motion to Sever and Stay Claims Against In-Flight Connectivity Systems Based on the Customer Suit Exception.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Disclosure of Preliminary Infringement Contentions, dated February 10, 2025.

3. Attached hereto as Exhibit B is a true and correct copy of the Complaint for Declaratory Judgment, *Viasat, Inc. v. Intellectual Ventures I LLC and Intellectual Ventures II LLC*, C.A. No. 1:25-cv-00056-CFC (D. Del. Jan. 14, 2025).

4. Attached hereto as Exhibit C is a true and correct copy of the Complaint for Declaratory Judgment, *Anuvu Corp. v. Intellectual Ventures I LLC and Intellectual Ventures II LLC*, C.A. No. 1:25-cv-00124-CFC (D. Del. Jan. 30, 2025).

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the 19th day of February, 2024, in Redwood Shores, California.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop